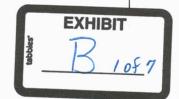
- A. Personally myself.
- Q. Did you or your company notify LFC Agricultural Services that you had hired this particular driver to take the bus to Virginia?
 - A. No.
- Q. Did you or your company notify LFC Enterprises, Inc., that this particular driver had been hired to take the bus from South Carolina to Virginia?
 - A. No.
- Q. Did you or your company notify Kuzzens, Inc., that this particular driver had been hired to take the bus from South Carolina so Virginia?
 - A. No.
- Q. Did you or your company provide any information about this driver to LFC Enterprises or LFC Agricultural Services or Kuzzens, Inc.?
 - A. No.
- Q. Did LFC Enterprises or LFC Agricultural Services or Kuzzens, Inc., have any involvement in the hiring of this particular driver to transport your bus from South Carolina to Virginia in 2011?
 - A. No.
 - Q. Who gave the driver instructions as to



what the job was that he was being hired to do?

A. Myself.

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- Q. And who gave the driver permission to operate the bus?
 - A. Myself.
- Q. When he began driving the bus from South Carolina, you mentioned that Tovar Guzman was also on the bus with him, is that right?
 - A. Correct.
- Q. Do you know if there was anybody else on the bus with him?
- A. No, sir, not that I know. Not when he left.
- Q. Did you learn before or after the accident that happened that the driver you had hired had left the bus?
 - A. No.
- Q. But at some point, you learned that he had left the bus, is that right?
 - A. After the accident, yes.
 - Q. After the accident?
 - A. Yes.
 - Q. And did you learn that from Tovar Guzman?
 - A. No. They just call me.
 - Q. Who called you?



- and I told him not to drive the bus. He wasn't allowed to drive the bus whatsoever.

 Q. And just to be clear, your company and
- Q. And just to be clear, your company and you never hired Tovar Guzman to drive the bus, correct?
 - A. No.
- Q. Did you or your company hire Tovar Guzman to drive the bus?
 - A. No.
- Q. Did you or your company give Tovar Guzman permission to drive the bus?
 - A. No.
- Q. Did you know that he was driving the bus before the accident?
 - A. No.
- Q. You spoke to Tovar Guzman on the telephone after the accident?
 - A. No.

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Q. I understand that. But after the season is over, say, you're going back to Florida in November or late October, what do you do with that book?

A. We keep it, the 6-Ls keeps a record of everything, Kuzzens.

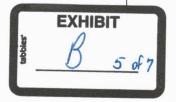
MR. BOBBY GARCIA: Basically, that notebook is pointless. It's just to keep records to write down at the end of the day. When the notebook is finished, it's gone. We start a new notebook.

BY MR. BROGAN:

- Q. So you don't keep that notebook?
- A. No.
- Q. The issue that we have here is that in your first deposition, you said that Tovar Guzman was working on Kuzzens farm harvesting tomatoes in June of 2011, okay?
 - A. Um-hmm.
 - Q. Do you agree with that statement?
 - A. Yes.
- Q. Do you agree that that statement is true now?
 - A. Yes.



permit it. It's whether you know it's happened 2 before. 3 A. Yes. BY MR. BROGAN: 4 5 Yes, it has happened? Α. Yes. 7 And that would explain how Tovar Guzman 0. 8 was working for Kuzzens in June of 2011, on their 9 farm, and yet LFC Agricultural Services' records 10 do not necessarily show? 11 MR. HARMAN: And I would object to the 12 form of that; calls for speculation. 13 MR. CASEY: I join in the objection. 14 MR. BROGAN: I withdraw the question and 15 will use it for argument, but, thank you. And I will move on. 16 17 BY MR. BROGAN: 18 Now, before 2011, how long had you worked 19 with Tovar Guzman? 20 He worked for me for about two years. A. 21 Q. Two? He'd had been working for you since 2005, correct? 22 23 A. I don't remember. 24 It was a long time he worked for you, Q. 25 right?



it needed to get there that next morning?

- A. Right.
- Q. And it was imperative -- it was important for him to get there the next morning?
 - A. Right.

MR. BOBBY GARCIA: It wasn't really that important to get there, but, yeah.

MR. BROGAN: It is his deposition.

BY MR. BROGAN:

- Q. So can you swear here that when you wrote in that notebook the names of the people who worked June 2011, that Tovar Guzman's name was in that notebook as someone who was working in the field in 2011?
 - A. Yes.
- Q. His name was in that notebook for June 2011, working in Kuzzens field in South Carolina? Yes?
 - A. No, no, no.
 - Q. No, it was not?
 - A. No.
 - Q. Why was his name not in the notebook?
 - A. I don't remember why. I don't remember.
- Q. I mean you said that if they worked in the field, you kept that notebook --



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laborers for Kuzzens farm?

A. Yes.

- Q. You employ them personally?
- A. They come to us, yes. They give us their ID. We get them registered. Take them to the office. And everything is good, 6-Ls put them to work, yes.
- Q. You keep saying "6-Ls." Who is 6-Ls?

 MR. BOBBY GARCIA: They have different

 names of companies. We always known when we

 started, it's 6-Ls.

MR. BROGAN: I will get it from him.

A. Now it's Lipman.

MR. HARMAN: Let me just say. He said personally. I think it's the company, but he personally for the company is the man making the decision.

MR. BROGAN: I agree, yes. BY MR. BROGAN:

Q. So you keep saying 6-Ls. 6-Ls is how these various farms that now under the control of what they call "Lipman" used to be known?

- A. Yes.
- Q. At some point in the last, I don't know, few years, they changed from 6-Ls to Lipman,

EXHIBIT

September 1 of 7